

EXHIBIT B

INDEX IN SUPPORT OF MOTION TO SEAL
JANSSEN MARKET RESEARCH (ECF NOS. 330, 331, & 357)

Material/Title of Document		Basis for Sealing (Legitimate Private or Public Interests That Warrant the Relief)	Clearly Defined and Serious Injury that Would Result if Relief Is Not Granted	Why a Less Restrictive Alternative to the Relief Sought Is Not Available	Prior Order Sealing the Same Materials	Party in Opposition to Sealing
<u>Letter from E. Evans Wohlforth, Jr. Esq. to Hon. Wolfson regarding SaveOnSP's Motion to Compel Janssen Market Research [dated May 21, 2024] (ECF No. 330)</u>		JJHCS requests the redaction of information and discussion in the May 21 letter that is not known to the general public and which the parties agreed to keep confidential. JJHCS maintains that these documents and exhibits contain sensitive business information.	If filed on the public docket, these portions of the May 21 letter would reveal confidential material relating to JJHCS's sensitive business information. Disclosure of this confidential and proprietary information to the public would cause irreparable harm to JJHCS because it would place JJHCS at a competitive disadvantage if its competitors	JJHCS requests the sealing of only the information that will reveal confidential information that is not known to the general public. No less restrictive alternative is available or practicable.	None	None
Page 1	("Market . . . need"), ("From . . . drugs")					
Page 2	("a . . . proposal"), ("to . . . programs"), ("CarePath . . . CarePath"), ("one . . . experience"), ("marketing . . . programs"), ("CarePath . . . drugs"), ("Objective . . . program"), ("J&J . . . drugs"), ("Immunology . . . research")					
Page 3	(" . . . brands"), (" . . . planning"), ("includes . . . America"), ("appears . . . experience"), ("budgets . . . case"), ("J&J . . . conditions"), ("pulling . . .					

Material/Title of Document		Basis for Sealing (Legitimate Private or Public Interests That Warrant the Relief)	Clearly Defined and Serious Injury that Would Result if Relief Is Not Granted	Why a Less Restrictive Alternative to the Relief Sought Is Not Available	Prior Order Sealing the Same Materials	Party in Opposition to Sealing
	administration”), (“Market . . .”), (“utilizing . . . brochures”)		secured the information.			
Page 3, note 1	(“Archbow . . . funds”), (“Review . . . ”)					
Page 4	(“email . . . changes”), (“Janssen . . . them”), (“Douglas . . . maximizers”), (“reactions . . . year”), (“J&J . . . programs”), (“Janssen . . . SaveOn”), (“Karen . . . year”), (“noted . . . dose”), (“Janssen . . . maximizers”)					
Page 5	(“a . . . Programs”), (“by . . . solution”), (“explicitly . . . withMe”), (“citing . . . maximizers”), (“It . . . Deep- Dive”), (“This . . . programs”)					
Page 7	(“patient . . . accumulators”), (“Janssen . . . expenses”), (“Janssen . . . confusion”), (“quoting . . . CarePath”), (“Janssen . . . confusing”)					

Material/Title of Document		Basis for Sealing (Legitimate Private or Public Interests That Warrant the Relief)	Clearly Defined and Serious Injury that Would Result if Relief Is Not Granted	Why a Less Restrictive Alternative to the Relief Sought Is Not Available	Prior Order Sealing the Same Materials	Party in Opposition to Sealing
Page 9	("Janssen . . . programs"), ("Market . . . dose"), ("Janssen . . . research"), ("citing . . . Expectations")					
Page 10, note 7	("attempts . . . document")					
Page 11	("Janssen . . ."), ("Market . . . need"), ("Reviewed . . ."), ("This . . . them"), ("J&J . . . drugs"), ("contemplating . . . affordability"), ("Janssen . . . patients")					
Exhibits 1-3, 5- 14, 18- 22, 24, 27-33, 37	Sealing of confidential emails and attachments regarding CarePath administration and/or business information and strategy	JJHCS requests the redaction of information in certain exhibits to the May 21 letter that is not known to the general public	If filed on the public docket, these exhibits to the May 21 letter would reveal confidential material relating to	JJHCS requests the sealing of only the information that will reveal confidential information	None	None

Material/Title of Document		Basis for Sealing (Legitimate Private or Public Interests That Warrant the Relief)	Clearly Defined and Serious Injury that Would Result if Relief Is Not Granted	Why a Less Restrictive Alternative to the Relief Sought Is Not Available	Prior Order Sealing the Same Materials	Party in Opposition to Sealing
Exhibit 15	Sealing of confidential financial information	and which the parties agreed to keep confidential. JJHCS maintains that these documents and exhibits contain sensitive business information.	JJHCS's sensitive business information.	that is not known to the general public. No less restrictive alternative is available or practicable.		
Exhibit 17	Sealing of contract with non-party		Disclosure of this confidential and proprietary information to the public would cause irreparable harm to JJHCS because it would place JJHCS at a competitive disadvantage if its competitors secured the information.			
Exhibit 23	Sealing of confidential notes					
Exhibits 25 & 34	Redaction of discovery responses regarding CarePath administration					
Exhibit 36	Redaction of discovery letter regarding CarePath confidential information					
<u>2024.05.31 JJHCS Opposition (ECF No. 357)</u>		JJHCS requests the redaction of information and discussion in the May 31 letter that is not known to the	If filed on the public docket, these portions of the May 31 letter would reveal confidential	JJHCS requests the sealing of only the information that will reveal confidential	None	None
Page 5	("previously . . . funds"), (" . . . research"), ("opportunities . . ."), (" . . ."), ("changes . . ."), (" . . .					

Material/Title of Document		Basis for Sealing (Legitimate Private or Public Interests That Warrant the Relief)	Clearly Defined and Serious Injury that Would Result if Relief Is Not Granted	Why a Less Restrictive Alternative to the Relief Sought Is Not Available	Prior Order Sealing the Same Materials	Party in Opposition to Sealing
	enhancements”), (“and . . . research”)	general public and which the parties agreed to keep confidential. JJHCS maintains that these documents and exhibits contain sensitive business information.	material relating to JJHCS’s sensitive business information. Disclosure of this confidential and proprietary information to the public would cause irreparable harm to JJHCS because it would place JJHCS at a competitive disadvantage if its competitors secured the information.	information that is not known to the general public. No less restrictive alternative is available or practicable.		
Page 5, note 2	(“budget . . .”)					
Page 6	(“. . . research”)					
Page 7	(“patient . . . maximizers”), (“a . . . programs”), (“ . . .”), (“a . . . Research”), (“reactions . . . patient”), (“it . . . findings”)					
Page 8	(“the . . . above”)					
Page 10, note 3	(“that . . . SaveOn”), (“patient . . . generally”), (“the . . . programs”)					
Page 11, note 4	(“passing . . . amount”), (“ . . . research”)					

Material/Title of Document		Basis for Sealing (Legitimate Private or Public Interests That Warrant the Relief)	Clearly Defined and Serious Injury that Would Result if Relief Is Not Granted	Why a Less Restrictive Alternative to the Relief Sought Is Not Available	Prior Order Sealing the Same Materials	Party in Opposition to Sealing
Exhibit 1	Sealing of slide presentation regarding confidential business information	JJHCS requests the redaction of information in certain exhibits to the May 31 letter that is not known to the general public and which the parties agreed to keep confidential. JJHCS maintains that these documents and exhibits contain sensitive business information.	If filed on the public docket, these exhibits to the May 31 letter would reveal confidential material relating to JJHCS's sensitive business information. Disclosure of this confidential and proprietary information to the public would cause irreparable harm to JJHCS because it would place JJHCS at a competitive disadvantage if its competitors secured the information.	JJHCS requests the sealing of only the information that will reveal confidential information that is not known to the general public. No less restrictive alternative is available or practicable.	None	None
Exhibit 2	Redaction of letter regarding the CAP program					

Material/Title of Document		Basis for Sealing (Legitimate Private or Public Interests That Warrant the Relief)	Clearly Defined and Serious Injury that Would Result if Relief Is Not Granted	Why a Less Restrictive Alternative to the Relief Sought Is Not Available	Prior Order Sealing the Same Materials	Party in Opposition to Sealing
<u>Letter from E. Evans Wohlforth, Jr. Esq. to Hon. Wolfson regarding SaveOnSP's Reply to J&J's Opposition to Motion to Compel Janssen Market Research [dated June 7, 2024] (ECF No. 331)</u>		JJHCS requests the redaction of information and discussion in the June 7 letter that is not known to the general public and which the parties agreed to keep confidential. JJHCS maintains that these documents and exhibits contain sensitive business information.	If filed on the public docket, these portions of the June 7 letter would reveal confidential material relating to JJHCS's sensitive business information. Disclosure of this confidential and proprietary information to the public would cause irreparable harm to JJHCS because it would place JJHCS at a competitive disadvantage if its competitors	JJHCS requests the sealing of only the information that will reveal confidential information that is not known to the general public. No less restrictive alternative is available or practicable.	None	None
Page 3	("J&J's . . . T&Cs"), ("J&J . . . program")					
Page 3, note 1	("Meeting . . ."), (" . . . research"), ("J&J . . . program"), ("universal . . . Programs"), ("market . . . T&Cs")					
Page 3, note 2	("they . . . Reform"), ("as . . . wide"), ("the . . . Programs"), ("J&J . . . benefit")					
Page 4, note 3	("showing . . ."), ("through . . ."), ("results . . . SaveOn"), ("chose . . . reasons"), ("anticipating . . . negative"), ("expressing . . . patients")					

Material/Title of Document		Basis for Sealing (Legitimate Private or Public Interests That Warrant the Relief)	Clearly Defined and Serious Injury that Would Result if Relief Is Not Granted	Why a Less Restrictive Alternative to the Relief Sought Is Not Available	Prior Order Sealing the Same Materials	Party in Opposition to Sealing
Page 6	(“J&J . . . JCP”), (“McCool . . . research”), (“This . . . custodian”)		secured the information.			
Page 7	(“Brand . . . insights”), (“ . . . planning”), (“indicating . . . planning”)					
Page 7, note 5	Various redactions					
Exhibit 38	Sealing of email and confidential attachments regarding CAP program	JJHCS requests the redaction of information in certain exhibits to the June 7 letter that is not known to the general public and which the parties agreed to keep confidential. JJHCS maintains that these documents and exhibits contain sensitive business	If filed on the public docket, these exhibits to the June 7 letter would reveal confidential material relating to JJHCS’s sensitive business information. Disclosure of this confidential and proprietary information to the	JJHCS requests the sealing of only the information that will reveal confidential information that is not known to the general public. No less restrictive alternative is	None	None
Exhibits 39 & 40	Sealing of confidential benefits investigations					
Exhibit 41	Sealing of email and attachments regarding confidential business information					

Material/Title of Document		Basis for Sealing (Legitimate Private or Public Interests That Warrant the Relief)	Clearly Defined and Serious Injury that Would Result if Relief Is Not Granted	Why a Less Restrictive Alternative to the Relief Sought Is Not Available	Prior Order Sealing the Same Materials	Party in Opposition to Sealing
		information. Additionally, Exhibits 39 and 40 contain confidential health information.	public would cause irreparable harm to JJHCS because it would place JJHCS at a competitive disadvantage if its competitors secured the information. Additionally, disclosure of confidential health information would also improperly reveal confidential health information to the public.	available or practicable.		
Exhibit 42	Redaction of discovery letter containing confidential business information					